

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 153**

In the Matter of:)	
Commission Rules Related to Electric)	NCSEA’S PETITION TO
Meters)	INTERVENE

NCSEA’S PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, the North Carolina Sustainable Energy Association (“NCSEA”) hereby petitions to intervene in the above-referenced docket. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located across the State. NCSEA’s mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
2. NCSEA and its members are keenly interested in advanced metering infrastructure (“AMI”) due to the real time data it provides and the potential clean energy options that it enables.
3. NCSEA is an intervenor in Commission Docket No. E-7, Sub 1115, in which the Public Staff supported a docket to update the Commission’s rules and Duke Energy Carolinas, LLC indicated that it did not object to such a docket, as the Commission referenced in its *Order Initiating Rulemaking Proceeding* in the above-captioned docket.

NCSEA shares the concerns of the Public Staff that several of the rules associated with metering and billing for utility service need to be reviewed and revised to accommodate technological advancements such as AMI.

4. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

5. NCSEA's address is 4800 Six Forks Road, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Peter H. Ledford
Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

6. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

Respectfully submitted,



Peter H. Ledford
N.C. State Bar No. 42999
General Counsel
NCSEA
4800 Six Forks Road
Suite 300
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(919) 832-7601 Ext. 107
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VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of NCSEA.

This the 27th day of September, 2017.



Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,
this the 27th day of September, 2017.

[AFFIX SEAL OF NOTARY]



Notary Public

**Daniel G Brookshire, Notary Public
Orange County, North Carolina
My Commission Expires 7/2/2022**



Printed Name of Notary Public
My Commission Expires: 7/2/2022

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 27th day of September, 2017.



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